

### REMARKS

Claims 4-20 are currently pending, wherein claim 4 has been amended, and claims 14-18 have been withdrawn from consideration. Applicants respectfully request favorable reconsideration in view of the remarks presented herein below.

On page 2 of the Action, the Examiner rejects claims 4-6 and 13 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,727,645 to Tsujimura et al. (“Tsujimura”), further in view of European Patent Application No. EP 0 794 569 to Endo et al. (“Endo”). Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. § 103(a), the Examiner must establish a *prima facie* case of obviousness. To establish a *prima facie* case of obviousness three criteria must be met. First, there must be some motivation to combine the cited references. Second, there must be a reasonable expectation of success. Finally, the combination must teach each and every claimed element. In the present case, claims 4-6 and 13 are not rendered unpatentable by the combination of Tsujimura and Endo because the Examiner fails to establish a *prima facie* case of obviousness as discussed below.

In rejecting claims 4-6 and 13, the Examiner asserts that Endo discloses the use of fluorine-containing amorphous carbon which has high heat resistance as an interlayer insulating film in a multi-layer interconnection structure of a semiconductor device. Therefore, the Examiner concludes that it would have been obvious to one skilled in the art to include a “diamond-like carbon (amorphous carbon) film between the first and second conductive layers,

in the contact wiring connecting the OLED to the control circuit of Tsujimura as disclosed by Endo for reducing interconnecting delays. This assertion is unfounded for the following reasons.

First, as noted by the Examiner, the fluorine-containing amorphous carbon film of Endo functions as an insulating film. In other words, it functions to electrically insulate the electrodes 202 and 203 from each other. In contrast, the diamond-like carbon film of the present invention functions to electrically connect the first and second conductive layers of the contact wiring structure. Accordingly, the fluorine-containing amorphous carbon film of Endo is not equivalent to the claimed diamond-like carbon film.

Second, if one skilled in the art were to provide the fluorine-containing amorphous carbon film between the first and second conductive layers in the contact wiring structure of Tsujimura, as suggested by the Examiner, the electrical connection between the emission control circuit and the organic light-emitting device would be lost because, as disclosed in Endo, the fluorine-containing amorphous carbon film functions as an insulating layer. Therefore, one skilled in the art would *not* have been motivated to modify the contact wiring structure of Tsujimura with the fluorine-containing amorphous carbon film as disclosed by Endo, as the combination would render the device of Tsujimura inoperable.

In addition, in order to expedite prosecution of the instant application, independent claim 4 has been amended to explicitly recite that the first and second conductive layers are electrically connected via the diamond-like carbon film. Accordingly, independent claim 4 is patentable over the combination of Tsujimura and Endo.

Claims 5, 6, and 13 variously depend from independent claim 4. Therefore, claims 5, 6, and 13 are patentable over the combination of Tsujimura and Endo for at least those reasons presented above with respect to claim 4. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 4-6 and 13 under 35 U.S.C. § 103(a).

On page 4 of the Action, the Examiner rejects claims 7, 8, 11, and 12 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tsujimura in view of Endo, further in view of U.S. Patent No. 6,833,667 to Hamano et al. ("Hamano"). Applicants respectfully traverse this rejection.

Claims 7, 8, 11, and 12 variously depend from independent claim 4. Therefore, claims 7, 8, 11, and 12 are patentable over the combination of Tsujimura and Endo for at least those reasons presented above with respect to claim 4. Hamano discloses an organic electroluminescence element and image forming apparatus. However, Hamano fails to overcome the deficiencies of Tsujimura and Endo.

Since Tsujimura, Endo, and Hamano each fail to disclose or suggest an organic light-emitting display apparatus that includes a wiring structure as claimed, the combination of these three references cannot possibly disclose said element. Therefore, even if one skilled in the art were motivated to combine Tsujimura, Endo, and Hamano, which Applicants do not concede, the combination would still fail to render claims 7, 8, 11, and 12 unpatentable because it fails to disclose each and every claimed element. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 7, 8, 11, and 12 under 35 U.S.C. § 103(a).

On page 5 of the Action, the Examiner rejects claims 9 and 10 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tsujimura in view of Endo and Hamano, further in view of U.S. Patent No. 6,351,067 to Lee et al. ("Lee"). Applicants respectfully traverse this rejection.

Claims 9 and 10 variously depend from claim 7. Therefore, claims 9 and 10 are patentable over the combination of Tsujimura, Endo, and Hamano for at least those reasons presented above with respect to claim 7. Lee discloses an organic electroluminescent device with improved hole injecting structure. However, Lee fails to overcome the deficiencies of Tsujimura, Endo, and Hamano.

Since Tsujimura, Endo, Hamano, and Lee each fail to disclose or suggest an organic light-emitting display apparatus that includes a wiring structure as claimed, the combination of these four references cannot possibly disclose said element. Therefore, even if one skilled in the art were motivated to combine Tsujimura, Endo, Hamano, and Lee, which Applicants do not concede, the combination would still fail to render claims 9 and 10 unpatentable because it fails to disclose each and every claimed element. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 9 and 10 under 35 U.S.C. § 103(a).

On page 7 of the Action, the Examiner rejects claim 19 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tsujimura in view of Endo, further in view of U.S. Patent No. 6,882,094 to Dimitrijevic et al. ("Dimitrijevic"). Applicants respectfully traverse this rejection.

Claim 19 depends from claim 4. Therefore, claim 19 is patentable over the combination of Tsujimura and Endo for at least those reasons presented above with respect to claim 4.

Dimitrijevic discloses a nanotube coated with diamond or diamond-like carbon. However, Dimitrijevic fails to overcome the deficiencies of Tsujimura and Endo.

Since Tsujimura, Endo, and Dimitrijevic each fail to disclose or suggest an organic light-emitting display apparatus that includes a wiring structure as claimed, the combination of these three references cannot possibly disclose said element. Therefore, even if one skilled in the art were motivated to combine Tsujimura, Endo, and Dimitrijevic, which Applicants do not concede, the combination would still fail to render claim 19 unpatentable because it fails to disclose each and every claimed element. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 19 under 35 U.S.C. § 103(a).

Also on page 7 of the Action, the Examiner rejects claim 20 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tsujimura in view of Endo, further in view of U.S. Patent No. 6,727,642 to Cho et al. ("Cho"). Applicants respectfully traverse this rejection.

Claim 20 depends from claim 4. Therefore, claim 20 is patentable over the combination of Tsujimura and Endo for at least those reasons presented above with respect to claim 4. Cho discloses a flat panel field emitter display whose unit cell structure adopts a planar cathode structure instead of a conventional microtip structure. However, Cho fails to overcome the deficiencies of Tsujimura and Endo.

Since Tsujimura, Endo, and Cho each fail to disclose or suggest an organic light-emitting display apparatus that includes a wiring structure as claimed, the combination of these three references cannot possibly disclose said element. Therefore, even if one skilled in the art were motivated to combine Tsujimura, Endo, and Cho, which Applicants do not concede, the

combination would still fail to render claim 20 unpatentable because it fails to disclose each and every claimed element. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 20 under 35 U.S.C. § 103(a).

The application is in condition for allowance. Notice of same is earnestly solicited. Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Penny Caudle (Reg. No. 46,607) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

By



Michael R. Cammarata

Registration No.: 39,491

BIRCH, STEWART, KOLASCH & BIRCH, LLP

8110 Gatehouse Road

Suite 100 East

P.O. Box 747

Falls Church, Virginia 22040-0747

(703) 205-8000

Attorney for Applicants